

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA,	:	
	:	
Plaintiff,	:	
	:	
v.	:	Criminal Action No. 08-05-SLR
	:	
TERRENCE ROSS,	:	
	:	
Defendant.	:	

MOTION FOR CONTINUANCE OF EVIDENTIARY HEARING

The Defendant, Terrence Ross, by and through his counsel, Eleni Kousoulis, Esquire, hereby moves the Court for an Order continuing the evidentiary hearing in this case.

In support of the motion, the defense submits as follows:

1. On April 30, 2008, the Court granted Defendant's Motion For Continue of Evidentiary Hearing in this case to allow the defendant time to consider a plea offer that was extended by the government. The evidentiary hearing is currently scheduled for May 19, 2008 at 3:30 p.m.
2. The Defendant would like additional time to decide whether or not to accept the government's plea offer. In addition, the defense is still awaiting the results of the drug analysis and testing in this case. The government is making every effort to obtain this report from the Medical Examiner's Office, but has not yet received this report from the Medical Examiner's Office, despite numerous requests on the part of the government. The Defendant would like to review this report prior to making a decision on whether or not to accept the government's plea offer.
3. The Defendant respectfully requests that the evidentiary hearing in this matter be

continued for the above-stated reasons.

4. Assistant United States Attorney, Ilana Eisenstein, does not oppose the Defendant's request for a continuance.

5. Defense counsel was informed by the Court's chambers that the Court has June 30, 2008, at 8:30 a.m. available to hold the Evidentiary Hearing in this case. All parties are available at that time.

6. The Defendant agrees to waive, pursuant to the Speedy Trial Act, any time between May 19, 2008 and the rescheduled date for the hearing.

WHEREFORE, for these reasons and any other such reasons that shall appear to the Court, the Defendant, Terrence Ross, respectfully requests that the evidentiary hearing in this case be continued.

Respectfully Submitted,

/s/ Eleni Kousoulis
Eleni Kousoulis, Esquire
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Attorney for Defendant Terrence Ross

Dated: May 15, 2008

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FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA,	:	
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Plaintiff,	:	
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v.	:	Criminal Action No. 08-05-SLR
	:	
TERRENCE ROSS,	:	
	:	
Defendant.	:	

ORDER

In response to Defendant's Motion for Continuance of Evidentiary Hearing, this Court
HEREBY ORDERS on this _____ day of _____, 2008, that Mr. Ross'
evidentiary hearing be re-scheduled for the _____ day of _____, 2008, at
_____ a.m./p.m., and that the time from May 19, 2008 up to the day of the re-scheduled
evidentiary hearing shall be excluded under the Speedy Trial Act (18 U.S.C. § 3161, et seq.).

HONORABLE SUE L. ROBINSON
United States District Court